

**FILED**  
Clerk  
District Court

**FEB 27 2008**

**For The Northern Mariana Islands**  
**By** \_\_\_\_\_  
(Deputy Clerk)

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For Pelisamen

UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,	)	Criminal Case No.: 08-00001
	)	
Plaintiff,	)	
	)	
vs.	)	MEMORANDUM IN SUPPORT OF MOTION
	)	TO MODIFY CONDITIONS OF BAIL
ARRIOLA, JOSEPH ALDAN and	)	
PELISAMEN, LUIS KAIPAT,	)	
	)	
Defendant	)	

COMES NOW, Loren A. Sutton, by and for Defendant Luis Kaipat Pelisamen, and moves this Court to Modify Conditions of the Defendant's Bail in the following manner and for the following reasons:

The Court is requested to Order that the Defendant no longer must wear a monitoring device and instead impose a curfew of 6:00 p.m. to 6:00 a.m. during which Defendant must not leave his house or the presence of his third party custodian.


1 The Defendant needs more freedom of movement in order to  
2 gather evidence, meet with his Counsel, meet with family members  
3 conversant with the Estate of Kaipat, and generally provide  
4 assistance in the matter of his defense.

5 The Defendant has lived on Saipan all of his life, his  
6 whole family is here and he is without funds. His passport has  
7 been seized and it is highly unlikely that he would flee the  
8 jurisdiction or even that he could flee the jurisdiction.

9 He has no history of violence and will not be a danger to  
10 the Community. There is no indication that he is dependant on  
11 any controlled substance or that he ever drinks alcohol to  
12 excess.

13 Accordingly, this Court is respectfully requested to  
14 remove the condition of release that he wear a monitoring  
15 device and replace that condition with a curfew and to make such  
16 other changes as the Court feels are appropriate.

17  
18 Respectfully submitted on this 27th<sup>th</sup> day of February 2008.

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21 /s/ LOREN A. SUTTON (F0179)  
22 for Defendant Peliseman  
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